

17-625-SAG

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**AFFIDAVIT IN SUPPORT OF APPLICATION
FOR A SEARCH WARRANT FOR US MAIL PARCELS**BY
AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
DEPUTY

Your Affiant, Douglas Heneger, United States Postal Inspector, Baltimore, MD, being
duly sworn, hereby deposes and states as follows:

I. Subject Parcel.

1. This is an Affidavit submitted in support of an Application for a Search Warrant for one (1) subject US Mail Parcel, hereinafter "Subject Parcel," or "SP." This subject parcel is currently located at the Incoming Mail Facility, in Linthicum Heights, Maryland. The subject parcel is specifically identified in Attachment A to this affidavit as follows:

<i>Subject Parcel</i>	<i>Express (E) or Priority (P) and Tracking ID number</i>	<i>From: Name and Address</i>	<i>To: Name and Address</i>
1.	(P) 9505510963117054079284	LL Summerville 3320 Mill St. Summerville, SC 29485	Jason Carlton 841 E Fort Ave. # 164 Baltimore, MD 21230

II. Affiant's Training and Experience

2. Your Affiant, Douglas Henegar, has been a United States Postal Inspector since April 2012 and has completed 12 weeks of basic investigative training, which included the investigation of narcotics related offenses. Your Affiant routinely investigates the use of the US Mail to ship narcotics and narcotics proceeds to and from the Baltimore/Washington area from the known narcotic source areas of Florida, Georgia, California, Arizona, Texas and Colorado (among others). As a result of your Affiant's training and experience, your Affiant is aware that Express Mail and Priority Mail services are regularly used by narcotics traffickers to ship controlled substances and bulk cash through the US Mail.

3. Based upon my training and experience in the field of narcotic interdiction through the mails, I know that there are suspicious characteristics common to many packages that contain narcotics, controlled substances or the proceeds thereof (i.e. US currency). These factors, more fully detailed below, are used to identify packages requiring further investigation. In the case of this search warrant, several of these factors were identified, and the package was alerted to by the drug detection canine. The most common factors or suspicious characteristics routinely observed in the course of screening packages are as follows:

a. *Contrasts observed between legitimate business parcels and drug parcels:* As an alternative to First Class Mail (which does not provide a customer with the capability to track the progress of a parcel through the system), the US Postal Service offers Priority Mail Express and Priority Mail. Priority Mail Express is guaranteed (money back) to be delivered on a set date and time, usually overnight. (That deadline is determined at the time of mailing.) The customer receives a receipt with this guaranteed information, and the sender can opt for a signature requirement at the other end or not. Customers can track the parcel on line by its distinct Priority Mail Express tracking number. The weight of the package and the distance traveled are the two main factors in setting the price. Priority Mail Express costs more than Priority Mail. Priority Mail has a delivery service standard of 1-3 business days, but delivery within that time period is not guaranteed. Priority Mail is a less expensive alternative to Priority Mail Express, but still provides the ability to track a parcel. Legitimate businesses using Priority Mail Express typically have a business or corporate account visible on the mailing label, which covers the cost of the mailing. In contrast, the drug distributor will pay for the cost of mailing the package at the counter by using cash or a credit card. Business Priority Mail Express parcels typically weigh no more than 8 ounces, and business Priority Mail parcels typically weigh no more than 2 pounds. Drug

packages typically exceed these weights. Address labels on business parcels are typically typed, whereas those on drug packages are typically hand written. In your affiant's experience, it is fairly easy to separate out smaller parcels, which constitute 70% to 80% of all Priority Mail Express and Priority Mail parcels, from other, heavier parcels. Typically, drug traffickers use Priority Mail Express, and will opt out of the requirement of obtaining a signature upon delivery.

b. *Invalid Sender/Return Address:* When drugs are shipped through the mail, the senders generally do not want them back. To distance themselves from parcels containing drugs, often the return addresses and the names of senders are fictitious or false. A fictitious or false address is anything from an incorrect zip code, to a non-existent house number or street. The name of the sender is also typically invalid in one of several ways. Your affiant has seen packages sent by persons with names of celebrities, cartoon characters, or fictional names. More often a search of a law enforcement database reflects that there is no association between the name of the sender and the address provided.

c. *Invalid Recipient/Address:* It would be counter-productive to put the wrong receiving address on a package, but often the named recipient is not actually associated with the receiving address. This allows the person receiving the package to claim that they did not know about its contents. Sometimes drug packages are addressed to vacant properties with the expectation that the postal carrier will just leave it at the address. The intended recipient will then retrieve it from that location and hope to remain anonymous.

d. *Location of Sender:* The fact that a package was sent from narcotics source states such as Arizona, California, Texas, Washington, Colorado, Puerto Rico and Florida (among others) can also indicate that the parcel contains controlled substances.

e. *Smell:* The odor of cocaine, marijuana, and methamphetamine are distinct, and through experience postal inspectors are familiar with these odors. On occasion, a parcel will emit an odor that is easily recognized without the assistance of a canine. Other smells that suggest that a parcel may contain narcotics include the aroma of masking agents. Common masking agents used in an attempt to thwart detection by law enforcement and canines typically include dryer sheets, coffee, mustard, and any other substance that releases a strong smell.

f. *Heavy Taping:* Heavily taped parcels are another factor that will suggest a drug parcel, because narcotics parcels are heavily taped in an effort to keep the smell inside and to forestall easy checking on the interior contents by lifting up a flap. For this reason, your affiant has also observed excessive glue on the flaps of narcotics parcels as well.

g. *Click-N-Ship:* The US Postal Service created Click-N-Ship as a service for frequent mailers and businesses who prefer printing address labels and purchasing postage from their residence or business. Drug traffickers create Click-N-Ship accounts as a means of giving a legitimate appearance to their drug mailings. They create the accounts using fictitious account information and often provide pre-paid credit cards as a means of payment, which are difficult to track. Drug traffickers often use legitimate business return addresses in states other than California and Arizona as a means to deter detection, as these other states are not usually considered "source" states for controlled substances. The postage labels are printed/taped, unlike the typical drug related mailing label which is handwritten.

4. It is your affiant's experience that when these factors are observed, a drug detection K-9 will likely "alert," next to the parcel, indicating that the dog has detected the presence of narcotics. As a result, these factors become a reliable way to profile the parcels being shipped every day.

5. The facts contained in this affidavit are based on my personal knowledge as well as that of the other agents involved in this investigation. All observations that were not made personally by me were related to me by persons with knowledge. This affidavit contains that information necessary to establish probable cause to support an application for a search warrant. This affidavit is not intended to include each and every fact and matter observed by or made known to agents of the government.

III. Probable Cause

6. On February 24, 2017, special agents from the Department of Homeland Security (HSI) notified Postal Inspectors of an individual operating a drug trafficking operation out of Ladson, South Carolina named Robert MANSFIELD. During the investigation, HSI Agents determined that MANSFIELD had received approximately thirty-one shipments of suspected narcotics, mainly through international mail. One shipment occurred in 2009, another shipment occurred in 2010, and the remaining twenty-nine shipments occurred between August 2015 and the present date. The investigation revealed that the sources of supply for MANSFIELD are located mostly in mainland China and Hong Kong. MANSFIELD maintains a residence at 104 Pinewood Street Unit/Apartment E Ladson, SC 29456.

7. Additionally, investigators were informed by HSI that international Express Mail parcel EA261795591HK was seized on February 2, 2107, at the JFK international mail processing facility. This parcel was addressed to 104 Pinewood Street Unit/Apartment E Ladson, South Carolina 29465. The parcel contained a shipment of 1,010 grams of fentanyl. The return address was listed as No 122 Hong Kong Street Kowloon Bay, Horngjaan, Hong Kong.

8. Numerous parcels addressed to MANSFIELD's residence, located at 104 Pinewood St. Unit E Ladson, SC 29456, have been identified and seized from the mail stream by

investigators. HSI Agents provided details of the following historical seizures that were addressed to MANSFIELD at his residence:

- a. **February 02, 2017-** 1,010 grams of fentanyl, sent via air shipment to MANSFIELD from Hong Kong
- b. **April 19, 2016-** 2 grams of MDMA (also known as ecstasy) a recreational designer drug; sent via air shipment to MANSFIELD from China
- c. **May 28, 2015-** 26 grams of ALPHA-PVP (also known as flakka or gravel, a recreational designer drug); 3 grams of Spice, a recreational designer drug; and 26 grams of Ethylone, a recreational designer drug; sent via air shipment to MANSFIELD from China
- d. **September 5, 2014-** 1.6 grams of Amphetamines; sent via air shipment to MANSFIELD from the Netherlands
- e. **September 5, 2014-** 2.3 grams of Marijuana; sent via air shipment to MANSFIELD from Germany
- f. **October 28, 2014-** 3.4 grams of MDMA (also known as Ecstasy) a recreational designer drug; sent via air shipment to MANSFIELD from China.

9. On February 24, 2017, at approximately 1000AM, investigators observed MANSFIELD depart his residence and drive to the Ladson Post Office, located in Ladson, SC. MANSFIELD was observed carrying a bag into the Post Office and later exited the Post Office and was observed to be in possession of United States Postal Service (USPS) mailing supplies. MANSFIELD then drove back to his residence. Once MANSFIELD had arrived at his residence, investigators executed a search warrant which was obtained in the District of South Carolina. Items recovered in the search of MANSFIELD's residence include approximately 100 grams of Fentanyl, packaging, and shipping materials. It was subsequently discovered that MANSFIELD had mailed fourteen parcels during his visit to the Ladson Post Office on the

morning of February 24, 2017. Twelve of the fourteen parcels mailed by MANSFIELD were immediately recovered from the Ladson Post Office and search warrants were obtained by Postal Inspectors. Parcel #13, addressed to Baltimore, MD and Parcel #14, addressed to Los Angeles, CA, however, made it into the mail stream. Further description of the seized parcels is attached to this affidavit as **Attachment B**. The twelve parcels that were seized were found to contain white powder in various quantities. The powder substance is suspected to be Fentanyl and was sent to a controlled lab for testing due to the hazardous nature of the substance.

10. On February 24, 2107, MANSFIELD was given his Miranda warnings and he agreed to speak with investigators without the presence of an attorney. MANSFIELD stated that he had mailed several parcels on the morning of February 24, 2017, and that the parcels he mailed contained Fentanyl. MANSFIELD, however, declined to give his consent to open any of the parcels.

11. On February 24, 2017, Postal Inspectors in Baltimore, MD were briefed on the ongoing investigation involving MANSFIELD, and that a parcel suspected to contain Fentanyl had made it into the mail stream. Baltimore Postal Inspectors were able to identify and track Subject Parcel #13, identified herein as USPS Priority Parcel #9505510963117054079284. The subject parcel was recovered from the Brooklyn South Mail Processing Facility, located in Baltimore, MD by Postal Inspectors on February 25, 2017. This Priority Parcel was identified through Postal records as one of the mailings sent by MANSFIELD from the Ladson Post Office on the morning of February 24, 2017.

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IV. Conclusion

8. Your affiant submits that based upon the above indicators reflected in the subject parcel described herein, based upon my training and experience, and based upon the post Miranda statements of defendant MANSFIELD, I believe there is probable cause the above-described subject parcel contain narcotics or controlled substances, and/or materials relating to the distribution of controlled substances through the United States Mail.



Douglas Henegar
United States Postal Inspector

Subscribed and sworn to before me this 27th day of February, 2017.



Stephanie A. Gallagher
United States Magistrate Judge

ATTACHMENT A

DESCRIPTION OF PARCELS TO BE SEARCHED

<i>Subject Parcel</i>	<i>Express(E) or Priority (P) and Tracking ID number</i>	<i>From: Name and Address</i>	<i>To: Name and Address</i>
1.	(P) 9505510963117054079284	LL Summerville 3320 Mill St. Summerville, SC 29485	Jason Carlton 841 E Fort Ave. # 164 Baltimore, MD 21230

ATTACHMENT B

Tracking Number	Addressee	Return Address
9505 5109 6313 7055 0861 10	Robin Dalton 119 Monohan Dr Apt 209 Fort Walton Beach, FL 32547	LL, Summerville 3320 Mill Street Summerville, SC 29485
9505 5109 6313 7055 0861 27	Jordon Gaetano 2546 Battle Creek Rd Springfield, TN 37172	No Return Address
9505 5109 6313 7055 0861 34	Marc Conforto 5 Liberty St #2 East Taunton MA 02718	No Return Address
9505 5109 6313 7055 0861 41	Ryan Barry 6197 Fox Run Ln Florence, KY 41042	LL, Summerville 3320 Mill Street Summerville, SC 29485
9505 5109 6313 7055 0861 58	Patrick Wu 305 Picea View Ct Derwood, MD 20855	LL, Summerville 3320 Mill Street Summerville, SC 29485
9505 5109 6313 7055 0861 65	Robin Freichels 22397 Country Rd 75 NW Big Lake, MN 55309	LL, Summerville 3320 Mill Street Summerville, SC 29485
EL554172679US	Jordon Nelms 436 Spring View Dr Franklin, TN 37064	UTR Log Svcs 1395 Benchwalk Dr Ladson SC 29456
EL248955325US	Joshua Harris 2013 Collier Blvd O'Fallon, MO 63366	UTR Log Svcs 1395 Benchwalk Dr Ladson SC 29456
EL248955339US	Dedra Eichstept 1430 Sylvan Road SW Atlanta, GA 30310	UTR Log Svcs 1395 Benchwalk Dr Ladson SC 29456
EL554172665US	B Burkleg 775 Northwood Hills Dr Hernando MS 38632	UTR Log Svcs 1395 Benchwalk Dr Ladson SC 29456
EL554171276US	Rafael Luna 194 Dorchester Ave Unit A Asheville, NC 28806	UTR Log Svcs 1395 Benchwalk Dr Ladson SC 29456
EL248955356US	Gesrae Rice 3125 Sunnyside St Stoughton, WI 53589	UTR Log Svcs 1395 Benchwalk Dr Ladson SC 29456